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FILED

NOV 15 2018 LA

THOMAS G BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

XIANBING GAN

a/k/a "Old Gan," and "Gary"

)

) No.

)

)

) Violations: Title 18, United States

) Code, Sections 1956(a)(1)(B)(i) and

) 1956(h)

18CR 781

JUDGE DURKIN

COUNT ONE

MAGISTRATE JUDGE COLE

The SPECIAL DECEMBER 2017 GRAND JURY:

Beginning in or about December 2015, and continuing until at least in or about May 2017, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

XIANBING GAN,
aka "Old Gan," aka "Gary,"

defendant herein, did knowingly conspire with Individuals A, B, and C, and other persons known and unknown to the Grand Jury, to commit an offense in violation of Title 18, United States Code, Section 1956, namely:

1. to knowingly conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of a specified unlawful activity, namely the felonious buying and selling and otherwise dealing in a controlled substance, knowing that the transaction was designed in whole or in part to conceal

and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

2. to transport, transmit, and transfer a monetary instrument and funds involving the proceeds of specified unlawful activity, namely, the felonious buying and selling and otherwise dealing in a controlled substance, from a place in the United States to and through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i);

All in violation of Title 18, United States Code, Section 1956(h).

COUNT TWO

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about June 29, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

XIANBING GAN,
aka "Old Gan," aka "Gary,"

defendant herein, did knowingly conduct a financial transaction affecting interstate and foreign commerce, namely, the receipt of approximately \$250,000 in United States currency, which involved the proceeds of a specified unlawful activity, namely, the felonious buying and selling and otherwise dealing in a controlled substance, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY